



LAW OFFICE OF PATRICK SORSBY PLLC

1568 Central Avenue
Albany, New York, 12205
Tel. (518)545-4LAW (4529)/ Fax : 1-866-474-1748
www.sorsbylaw.com

December 4, 2015

VIA ECF FILING

United States District Court
Northern District of New York
James T. Foley U.S. Court House
445 Broadway
Albany, NY 12207-2974

Att: Magistrate Judge Daniel J. Stewart

Re : Civil Action No. 1:14-cv-434
Gorman v. Rensselaer County et. Al

Dear Magistrate Judge Daniel J. Stewart ,

As there remain a number of outstanding discovery issues I am requesting a discovery conference as prelude to the making of a motion to compel.

Defendant's First Discovery response indicated that the Defendants would provide a missing audio file via email. Mr. Martin stated in his discovery response that he would be emailing this file to me. As of today I have not received this. Additionally in response to a discovery request Mr. Marin provided an incomplete CD. Mr. Martin was informed of this but to date has failed to provide a responsive CD.

Plaintiffs Second Document Request was served on October 9, 2015. The Defendants Response was due November 9, 2015. I have inquired of Mr. Martin as to its status and have received no answer. Defendant's response is almost 30 days late. As I cannot effectively examine deponents without the discovery I have sought I need to reschedule the remaining deponents for January. Given the pressing discovery deadlines it is critical that the Defendants timely comply with discovery.



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I would prefer to schedule the conference as soon as possible. I am available from noon to five on Wednesday 12/9, Thursday 12/10 8:30 to 9:30 and then from 11:00 am till 5:00pm, and all day Friday 12/11.

Respectfully Submitted,

LAW OFFICE OF PATRICK SORSBY

By _____ S/

Patrick Sorsby

Bar Roll No.: 517840

Attorney for Plaintiff

1568 Central Avenue

Albany, NY 12205

Phone: (518) 545-4529

E-mail: sorsbylaw@gmail.com

CC: **Via ECF**

Kevin G. Martin, Esq.

Bar Roll No. 505332 Attorneys for Rensselaer County Defendants

421 Broad St.

Utica, New York 13501 (315) 507-3765

kmartin@martinrayhill.com